

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.  
Petitioner

v.

MAXELL, LTD.  
Patent Owner

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Case No. IPR2020-00409  
U.S. Patent No. 6,580,999

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,580,999**

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## I. INTRODUCTION

Petitioner Apple Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1-6 (collectively, the “Challenged Claims”) of U.S. Patent No. 6,580,999 (“the ’999 Patent”). *’999 Patent* (Ex. 1001).

## II. SUMMARY OF THE ’999 PATENT

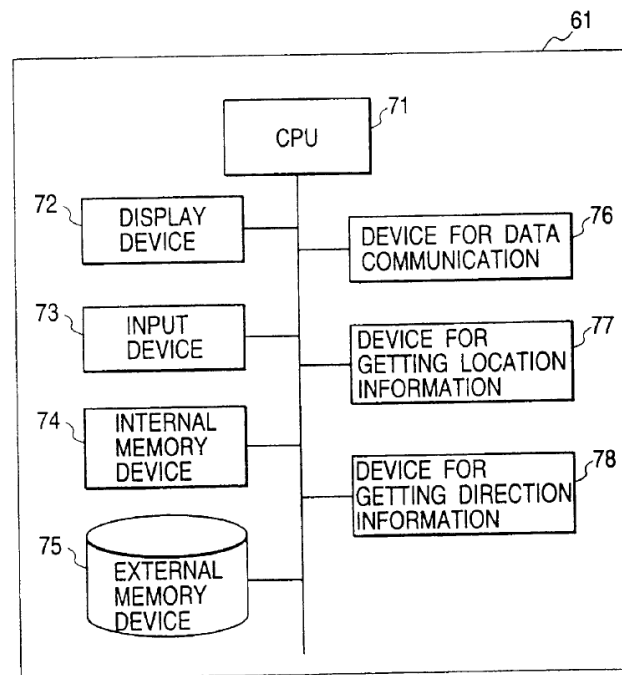
### A. Description of the alleged invention of the ’999 Patent

The ’999 Patent generally describes “a portable terminal provided with the function of walking navigation, which can supply location-related information to the walking user.” *’999 Patent* (Ex. 1001), 1:14-16. According to the ’999 patent, conventional navigation systems at the time of the invention were unsuitable for walking navigation because they were too large to be carried by a walking user, while maps provided by conventional map information services could not be displayed clearly on the small screens of portable telephones. *Id.* at 1:29–36; 1:44–50. The invention of the ’999 patent purportedly addressed these problems by providing a portable terminal that can “supply location information easier for the user to understand during walking.” *Id.* at 2:49–50.

The ’999 Patent describes a “portable terminal . . . with the function of walking navigation [that] is provided with data communication, input, and display devices just like those of ordinary portable telephones and PHS [Personal Handyphone System] terminals, as well as a device for getting location information and a device for getting direction information denoting the user’s present place.” *Id.*

at 2:58–64. Figure 10 of the '999 Patent depicts the primary components of the described portable device:

FIG. 10



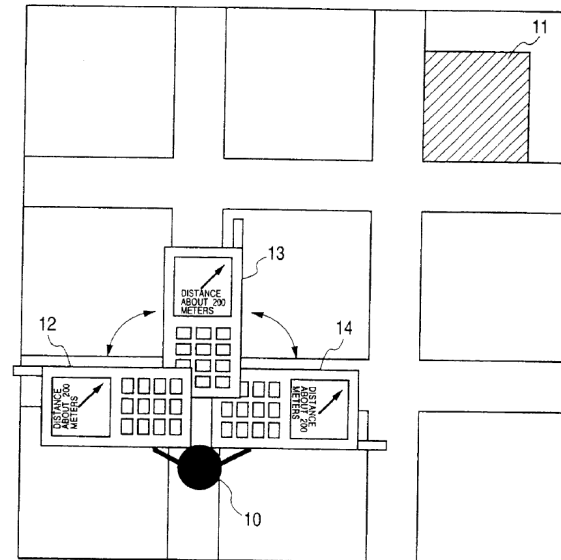
*Id.* at Fig. 10.

The portable terminal obtains location information and direction information of the terminal. *Id.* at Abstract, 2:62–67. Based on this terminal information, the portable terminal obtains and displays information such as route guidance for reaching a destination, which in some circumstances may be the location of another portable terminal. *Id.* at Abstract, 3:1–37; 8:41–44; Fig. 5. The portable terminal displays the direction of a destination with an orientation of a line in the form of an

indicating arrow that always points in the direction of the destination. *Id.* at Abstract.

Such a display is depicted below:

FIG. 1



*Id.* at Fig. 1; *see also id.* at Figs 3(a) and 3(b) (showing other displays).

### **B. Summary of the prosecution history of the '999 Patent**

The Application that resulted in the '999 Patent was filed on June 18, 2002 as US App. No. 10/173,423 and claims priority to Japanese Patent 11-197010, which was filed July 12, 1999. '999 Patent (Ex. 1001). For purposes of this proceeding, Petitioner applies July 12, 1999 as the priority date for the Challenged Claims.

On June 18, 2002, the Examiner rejected all claims of the application that resulted in the '999 Patent under the non-statutory doctrine of double patenting as unpatentable over the claims of U.S. Patent No. 6,430,498 (the "'498 Patent"). '999

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